

Exhibit 45

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING,
SLAES PRACTICES AND PRODUCTS
LIABILITY LITIGATION

MDL Docket No. 2738

This Document Relates To All Cases

DECLARATION OF NANCY O'REILLY, MHS, PMP

I, Nancy E. O'Reilly, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that to the best of my knowledge the following is true and correct:

1. I am over 21 years of age and have personal knowledge of the facts and matters attested to in this Declaration. I am competent to be a witness to the facts and matters attested to in this Declaration.

2. I am the Senior Director, Clinical Guidance of the American College of Obstetricians and Gynecologists ("ACOG"). I have worked for ACOG for more than 29 years. I have a Masters in Health Science from John Hopkins University and am a certified Project Management Professional from the Project Management Institute.

3. ACOG is a professional membership organization for obstetrician–gynecologists. The College produces practice guidelines for health care professionals and educational materials for patients, provides practice management and career support, facilitates programs and initiatives to improve women's health, and advocates for members and patients.

4. Consistent with the CMSS Code for Interactions with Companies, ACOG accepts corporate donations and sponsorships. Johnson & Johnson and affiliated companies have, at times,

donated funds to support ACOG projects. A true and accurate statement of all donations from Johnson & Johnson and its affiliates to ACOG is attached as Exhibit A.

5. ACOG's clinical guidance, educational activities, scientific programs, products, services and advocacy positions are separated from and independent of corporate sponsorships or donations and all content is independently developed. ACOG discloses on its website corporate support or sponsorships and that information is available to members and the public.

6. Because of concerns regarding potential discomfort or pain, ACOG has not (and does not) recommend the use of talcum powder as a vaginal treatment.

7. In 2017, ACOG included the following statement on its website from Hal C. Lawrence, III, M.D., the Executive Vice President and CEO of ACOG at the time:

'Despite an observed association, several decades of medical research have not demonstrated a direct causative link between the use of talcum powder and ovarian cancer. Although some case-control studies suggested an association, with a small increase in risk, prospective cohort studies have not demonstrated an increased risk. It is important to note that there are limitations associated with the studies that have investigated this association, which include several types of bias, inadequate sample sizes and the rarity of the disease. Because of concerns regarding potential discomfort or pain, obstetrician-gynecologists do not recommend use of vaginal treatments such as douche, vaginal sprays or talcum powder and the use of talcum powder has declined over the years. There is no medical consensus that talcum powder causes ovarian cancer.'

8. That statement, however, was not intended to be and is not a formal Practice Advisory or Committee Opinion. It is not clinical guidance. The existing evidence at the time did not support a firm clinical conclusion regarding whether there was a direct causative link between the use of talcum powder and ovarian cancer.

9. In 2019, ACOG considered whether new facts or research had developed that would merit revision to the statement or a more formal guidance document. ACOG concluded that the existing evidence again did not support a firm clinical conclusion. Based on the evidence reviewed,

ACOG did not reach a clinical conclusion whether there was a causative link between the use of talcum powder and ovarian cancer.

10. Since then, ACOG has not issued any formal Practice Advisory or Committee Opinion or performed a systematic review on the use of talcum powder and ovarian cancer.

11. ACOG has not issued any clinical guidance or conclusions regarding potential risk or the safety of genital application of talcum powder.

Executed in Washington, D.C. on 8/14/24.

By: 
Nancy E. O'Reilly, MHS, PMP

Appendix A

Donor name	Date	Amount	Fund
Johnson & Johnson Health Care Systems, Inc.	12/14/2023	100,000	Compassionate Conversations Webinar: Alloimmunity and Autoimmunity in pregnancy
Johnson & Johnson	12/7/2020	30,000.00	Patient Safety Forum Member Contributions
Johnson & Johnson	1/2/2019	307,237.00	Uganda Surgical Skills Grant
Johnson & Johnson	6/27/2018	30,000.00	Patient Safety Forum Member Contributions
Janssen Scientific Affairs, LLC	4/25/2017	5,000.00	ACM Corporate Contributions
Johnson & Johnson	8/8/2016	30,000.00	Patient Safety Forum Member Contributions
Janssen Scientific Affairs, LLC	4/12/2016	2,500.00	Funds for joint programming
Johnson & Johnson	6/9/2015	79,660.00	Uganda Surgical Skills Grant
K-Y Brand	3/10/2010	15,000.00	ACM Corporate Contributions
Janssen Scientific Affairs, LLC	9/15/2008	3,000.00	Annual Dues for Membership to Friends of ACOG
Johnson & Johnson Personal Product Wldwde	8/7/2007	3,000.00	Annual Dues for Membership to Friends of ACOG
Janssen Scientific Affairs, LLC	2/5/2007	26,000.00	Research Fellowships and Awards
Janssen Scientific Affairs, LLC	2/5/2007	62,000.00	Research Fellowships and Awards
Janssen Scientific Affairs, LLC	1/28/2007	5,500.00	Donations for CREOG
Janssen Scientific Affairs, LLC	1/28/2007	6,000.00	Donations for CREOG
Janssen Scientific Affairs, LLC	11/15/2006	15,000.00	ACM Corporate Contributions
Janssen Scientific Affairs, LLC	4/17/2006	100,000.00	Distribution of Prolog to residents
Janssen Scientific Affairs, LLC	2/13/2006	20,000.00	Research Fellowships and Awards
Janssen Scientific Affairs, LLC	2/8/2006	62,000.00	Research Fellowships and Awards
Janssen Scientific Affairs, LLC	1/28/2006	5,500.00	Donations for CREOG
Janssen Scientific Affairs, LLC	12/6/2005	3,000.00	Annual Dues for Membership to Friends of ACOG
Janssen Scientific Affairs, LLC	9/19/2005	10,000.00	ACM Corporate Contributions
Janssen Scientific Affairs, LLC	8/15/2005	8,156.86	Distribution of Prolog to residents
Johnson & Johnson Personal Product Wldwde	7/8/2005	3,000.00	Annual Dues for Membership to Friends of ACOG
Janssen Scientific Affairs, LLC	6/8/2005	62,000.00	Research Fellowships and Awards
Janssen Scientific Affairs, LLC	12/31/2004	2,500.00	Donations for CREOG
Janssen Scientific Affairs, LLC	10/14/2004	9,471.72	Advertising
Janssen Scientific Affairs, LLC	10/14/2004	9,471.72	Advertising
Janssen Scientific Affairs, LLC	8/11/2004	1,497.83	Awards Administration Fee
Janssen Scientific Affairs, LLC	8/11/2004	3,000.00	Annual Dues for Membership to Friends of ACOG
Janssen Scientific Affairs, LLC	8/3/2004	23,100.00	ACM Exhibit Revenue
Johnson & Johnson Personal Product Wldwde	12/11/2003	3,000.00	Annual Dues for Membership to Friends of ACOG
Janssen Scientific Affairs, LLC	11/19/2003	75,000.00	Distribution of Prolog to residents
Janssen Scientific Affairs, LLC	10/7/2003	3,000.00	Annual Dues for Membership to Friends of ACOG
Janssen Scientific Affairs, LLC	9/11/2003	10,000.00	ACM Corporate Contributions

Janssen Scientific Affairs, LLC	1/9/2003	3,000.00	Annual Dues for Membership to Friends of ACOG
Johnson & Johnson Personal Product Wldwde	8/1/2002	3,000.00	Annual Dues for Membership to Friends of ACOG
Janssen Scientific Affairs, LLC	7/3/2002	3,000.00	Annual Dues for Membership to Friends of ACOG
Johnson & Johnson Personal Product Wldwde	1/10/2002	3,000.00	2001-02 Friends of ACOG
Janssen Scientific Affairs, LLC	7/25/2001	3,000.00	2001-02 Friends of ACOG
Johnson & Johnson Personal Product Wldwde	7/10/2001	3,000.00	2001-02 Friends of ACOG
Janssen Scientific Affairs, LLC	9/7/2000	5,000.00	Library for History
Janssen Scientific Affairs, LLC	7/6/2000	3,000.00	2000-01 Friend of ACOG
Johnson & Johnson Personal Product Wldwde	10/28/1999	3,000.00	1999-00 Friends of ACOG
Janssen Scientific Affairs, LLC	8/24/1999	5,000.00	Armed Forces District Junior Fellow Educational Fund
Janssen Scientific Affairs, LLC	8/18/1999	3,000.00	1999-00 Friends of ACOG
Janssen Scientific Affairs, LLC	5/19/1999	5,469.06	Pete & Weesie Hollis Endowment Fund
Janssen Scientific Affairs, LLC	6/29/1998	2,500.00	1998 Friends of ACOG
Johnson & Johnson Personal Product Wldwde	6/22/1998	2,500.00	1998 Friends of ACOG
Janssen Scientific Affairs, LLC	1/8/1998	5,000.00	Pete & Weesie Hollis Endowment Fund
Johnson & Johnson Personal Product Wldwde	10/10/1997	2,500.00	97 Friends of ACOG
Janssen Scientific Affairs, LLC	6/12/1997	2,500.00	97 Friends of ACOG
Janssen Scientific Affairs, LLC	11/26/1996	5,000.00	Library for History
Johnson & Johnson Medical, Inc.	8/13/1996	2,500.00	1996 FRIENDS OF ACOG
Janssen Scientific Affairs, LLC	6/18/1996	2,500.00	1996 FRIENDS OF ACOG
Johnson & Johnson Personal Product Wldwde	5/30/1996	2,500.00	1996 FRIENDS OF ACOG
Johnson & Johnson Personal Product Wldwde	6/15/1995	2,500.00	FRIENDS OF ACOG 95-96
McNeil Specialty Products	6/15/1995	2,500.00	FRIENDS OF ACOG 95-96
Janssen Scientific Affairs, LLC	6/8/1995	2,500.00	FRIENDS OF ACOG 95-96
Johnson & Johnson Medical, Inc.	6/5/1995	2,500.00	FRIENDS OF ACOG 95-96
Janssen Scientific Affairs, LLC	3/30/1995	5,000.00	Library for History
McNeil Specialty Products	9/26/1994	2,500.00	1994 Development Fund
Johnson & Johnson Consumer Products, Inc.	9/2/1994	2,500.00	1994 Development Fund
Johnson & Johnson Medical, Inc.	7/21/1994	2,500.00	1994 Development Fund
Johnson & Johnson Personal Product Wldwde	6/23/1994	2,500.00	1994 Development Fund
Janssen Scientific Affairs, LLC	6/9/1994	2,500.00	1994 Development Fund
Johnson & Johnson Medical, Inc.	12/30/1993	2,500.00	1993 Development Fund
Johnson & Johnson Consumer Products, Inc.	6/28/1993	2,500.00	1993 Development Fund
Janssen Scientific Affairs, LLC	6/22/1993	2,500.00	1993 Development Fund
Johnson & Johnson Personal Product Wldwde	6/21/1993	2,500.00	1993 Development Fund

Johnson & Johnson Consumer Products, Inc.	8/17/1992	2,500.00	1992 Development Fund	
Janssen Scientific Affairs, LLC	6/25/1992	2,500.00	1992 Development Fund	
Johnson & Johnson Personal Product Wldwde	6/19/1992	2,500.00	1992 Development Fund	
Janssen Scientific Affairs, LLC	2/24/1992	5,000.00	Library for History	
Janssen Scientific Affairs, LLC	8/15/1991	2,500.00	1991 Development Fund	
Johnson & Johnson Personal Product Wldwde	7/22/1991	2,500.00	1991 Development Fund	
Janssen Scientific Affairs, LLC	3/11/1991	5,000.00		1
Johnson & Johnson Medical, Inc.	8/14/1990	2,500.00	1990 Development Fund	
Janssen Scientific Affairs, LLC	7/23/1990	2,500.00	1990 Development Fund	
Johnson & Johnson Personal Product Wldwde	7/23/1990	2,500.00	1990 Development Fund	
Johnson & Johnson	9/11/1989	2,000.00	1989 Development Fund	
Johnson & Johnson Personal Product Wldwde	7/12/1989	2,000.00	1989 Development Fund	
Janssen Scientific Affairs, LLC	6/19/1989	2,000.00	1989 Development Fund	
Johnson & Johnson Personal Product Wldwde	12/5/1988	2,000.00	1988 Development Fund	
Janssen Scientific Affairs, LLC	6/6/1988	2,000.00	1988 Development Fund	
Janssen Scientific Affairs, LLC	2/10/1988	7,500.00		1
McNeil Consumer & Specialty Pharmaceuticals	7/27/1987	2,000.00	1987 Development Fund	
Janssen Scientific Affairs, LLC	6/12/1987	2,000.00	1987 Development Fund	
Janssen Scientific Affairs, LLC	6/8/1987	50,000.00	Capital Campaign Unrestricted Gift	
Janssen Scientific Affairs, LLC	5/25/1986	2,000.00	1986 Development Fund	
Janssen Scientific Affairs, LLC	5/23/1985	2,000.00	1985 Development Fund	
Janssen Scientific Affairs, LLC	12/12/1983	15,000.00	Library for History	